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27 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

28 CHASOM BROWN, *et al.*, individually and
on behalf of themselves and all others
similarly situated,

29 Plaintiffs,

30 v.

31 GOOGLE LLC,

32 Defendant.

Case No. 4:20-cv-03664-YGR-SVK

33 **DECLARATION OF JOSEPH H.
34 MARGOLIES IN SUPPORT OF JOINT
35 SUBMISSION RE: SEALING PORTIONS
36 OF THE MARCH 2, 2023 HEARING
37 TRANSCRIPT REGARDING ORDER TO
38 SHOW CAUSE**

39 Judge: Hon. Susan van Keulen, USMJ

1 I, Joseph H. Margolies, declare as follows:

2 1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for
 3 Defendant Google LLC (“Google”) in this action. I have been admitted *pro hac vice* in this matter.
 4 Dkt. 681. I make this declaration of my own personal, firsthand knowledge, and if called and sworn
 5 as a witness, I could and would testify competently thereto.

6 2. I am making this declaration pursuant to Civil Local Rule 79-5 as an attorney for
 7 Google as the Designating Party.

8 3. On March 1, 2023, The Court issued its Redaction Order (Dkt. 881), requiring the
 9 parties to jointly submit proposed redactions to the Sealed Transcript of Proceedings for the March
 10 2, 2023 Hearing regarding Order to Show Cause within 7 days of receipt of the transcript. The
 11 parties received the transcript on March 14, 2023.

12 4. On March 17, 2023, I sent counsel for Plaintiffs Google’s proposed redactions by
 13 email in the form of a proposed joint submission. On March 21, 2023, Plaintiffs’ counsel confirmed
 14 that Plaintiffs do not object to Google’s proposed submission. Accordingly, today’s submission is
 15 presented jointly.

16 5. The information requested to be sealed contains Google’s highly confidential and
 17 proprietary information regarding highly sensitive features of Google’s internal systems and
 18 operations, including various types of Google’s internal projects, internal project code names,
 19 internal team names, data fields, and logs, and their proprietary functionalities, as well as internal
 20 metrics, that Google maintains as confidential in the ordinary course of its business and is not
 21 generally known to the public or Google’s competitors. Such confidential and proprietary
 22 information reveals Google’s internal strategies, system designs, and business practices for
 23 operating and maintaining many of its important services, and falls within the protected scope of the
 24 Protective Order entered in this action. *See* Dkt. 81 at 2–3. Public disclosure of such confidential
 25 and proprietary information could affect Google’s competitive standing as competitors may alter
 26 their systems and practices relating to competing products. It may also place Google at an increased
 27 risk of cybersecurity threats, as third parties may seek to use the information to compromise
 28 Google’s internal practices relating to competing products.

6. Google's request is narrowly tailored in order to protect its confidential, privileged, and protected information. The proposed redactions are limited in scope and volume.

7. Google does not seek to redact or file under seal any of the remaining portions of the transcript not indicated in the accompanying submission.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Bayside, Wisconsin on March 21, 2023.

By */s/ Joseph H. Margolies*

Joseph H. Margolies
Attorney for Defendant